

20. Do your written policies and procedures include a section for:
- a) Ethics and professional conduct—standards of conduct governing the performance of employees involved in purchasing and contract award and administration. Recipients must create safeguards against conflicts of interest and kickbacks and establish disciplinary actions to be used in case of a violation.
 - b) Personnel—position descriptions; the recruiting and hiring process; pay scales and compensation; fringe benefits; timekeeping methods; and termination policy.
 - c) Accounting Transactions—timely recording of transactions and determination of the reasonableness, allocability, and allowability of costs (see item 3 below) in accordance with the provisions of the applicable federal cost principles, agency regulations, and contract terms and conditions.
 - d) Payments—
 - e) Allowability of costs—Costs must be reasonable. Costs must be given consistent treatment through application of Generally Accepted Accounting Principles (GAAP). Costs must conform to any limitation or exclusions set forth in the contract or federal Cost Principles.
 - f) Property and Equipment—equipment records; inventory and control requirements; maintenance procedures; disposition procedures.
 - g) Records Retention—details how long to keep financial and programmatic records by type of document.
 - h) Purchasing—establishes internal controls and includes codes of conduct, competition, purchasing procedures, cost and price analysis, and purchasing records.